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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

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Janet Feldstein
Site Investigation and Compliance Branch
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US Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

JUL 08 1988

Dear Ms. Feldstein:

Re: SCP Carlstadt, New Jersey
Remedial Investigation Report Dated April 1988
Comments on the Draft Report

The Department has completed a review of the above referenced report and our comments on this report are as follows:

GENERAL COMMENTS/RECOMMENDATIONS

1. The current draft RI document encompasses the onsite work conducted in 1987. Chemical concentrations documented in the monitor wells situated along the property boundaries indicate potential migration of these chemicals offsite via the ground water. The vertical and horizontal extent of this migration must be delineated. Therefore, this report should be termed the Phase I or "onsite" RI report and it should state that additional investigations are needed.
2. The executive summary and the soil, sediment and ground water quality sections should indicate the degree of contamination present in each media. The short summaries, tables and figures provided must be supplemented by a more objective interpretation of the data.
3. Priority pollutant analyses were conducted during the RI but it is unclear if non-targeted compound searches (+40 compounds) were included. If this data is available, it should be included in Appendix B and the results must be discussed in the text. SCP has a long history of handling diverse chemicals and may exhibit non-targeted constituents. The data indicate severe contamination is present. Therefore, a more thorough characterization is needed.
4. Aerial photographs reviewed by this Department reveal the possible existence of three (3) sludge lagoons/surface impoundments in the

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northeast area of the site (see figure #2). This must be more fully investigated and reported on.

5. The conclusions drawn in the subject document are distributed throughout the text of their respective sections. In order to more easily identify these conclusions, they should be summarized in a separate section.

SPECIFIC COMMENTS/RECOMMENDATIONS

1. Section 1.4, Page 5 - Overview of the Report

The descriptions of Sections 6.0, 7.0 and 8.0 must be provided here as are provided for the other sections in this paragraph.

2. Section 4.2.3, Page 25 - Soil Quality

The soil PCB commentary should describe the degree of contamination present. It should include highlights (example: 15,000 ppm of arochlor 1242 at boring 1) and trends found in the data. The media quality sections must be expanded to adequately characterize and delineate the extent of the onsite contamination.

3. Section 4.2.3, Page 27 - Soil Quality

Mean values have been presented for several analytical parameters at different site sampling locations. Using calculations provided with the raw data in Appendix B, several large deviations in the results occur when comparing values in the study and recalculated values. For example: the mean PCB (arochlor 1242) concentration for boring RMW-7D is given as 0.187 mg/kg; recalculation yields 4.05 mg/kg of arochlor 1242, in addition to 8.05 mg/kg total PCBs. The total petroleum hydrocarbon mean concentrations for RMW-2D and RMW-5D are presented as 77 and 88 mg/kg respectively; recalculation yields 3,237 and 16,228 mg/kg. Several other discrepancies can be found in the calculations. The values must be recalculated and a written explanation provided to account for the differences.

4. Sections 5.1.2 - 5.2.2, Pages 37-42 - Surface Water, Sediment Quality

The quantification of the contamination is absent in the surface water and sediment quality sections. Summaries indicating concentrations of individual analyte groupings must be provided. This quantification should include a discussion of the levels detected and a comparison to available standards where applicable.

5. Section 5.2.2, Pages 39-42 - Sediment Quality

This section's commentary should describe the degree of contamination present in the sediment. Evaluation of the data should include temporal and spacial trends of sediment deposition. Tidal influences on the concentration of contaminants within sediments should be discussed in this section as well. The proximity of sampling locations #3 and #4 makes most of the commentary provided insignificant. For

example, compounds found at the SCP site were present in the sediment upstream at location #4 (benzene, chlorobenzene, fluoranthene, fluorene, phenanthrene, pyrene) while absent at location #3 adjacent to the SCP site. In addition, due to the lack of a thorough discussion of the information available and a sufficient database, statements implying an upstream contaminant source are unsubstantiated without further investigation and should be deleted.

6. Table 1 and Figure 5 - Well Data, Vicinity of SCP Site

Table 1 and Figure 5 must be updated to reflect current well conditions. Figure 5 well locations have been changed since past submissions. The industrial wells installed at Trubeck Laboratories in 1949-1953 should be located approximately 1 mile to the southwest of the plotted location in Figure 5. UOP succeeded Trubeck and the facility was decommissioned in 1980, hence, these wells are out of service.

7. Table 11 - Physicochemical Parameters - Till Aquifer, SCP Site


This data must be provided in tabular form as was done for the water table aquifer chemical data.

8. Table 12 - Surface Water Samples, July 1987

There is a discrepancy between Table 12 and information provided in Appendix B and Figure 38. The table states that petroleum hydrocarbons were detected at all four surface water sampling locations with a mean concentration of 6.9 ppm. Appendix B and Figure 38 indicate that the petroleum hydrocarbons are below detection (below 1 or 2 ppm). This discrepancy must be resolved in the next draft of the RI report.

If you have any questions or comments, please contact me at (609) 633-0701. Also, please be advised that the Department is developing comments on the ARARs submittal dated June 30, 1988. The Department's comments will be telefaxed to you on July 15, 1988.

Sincerely,

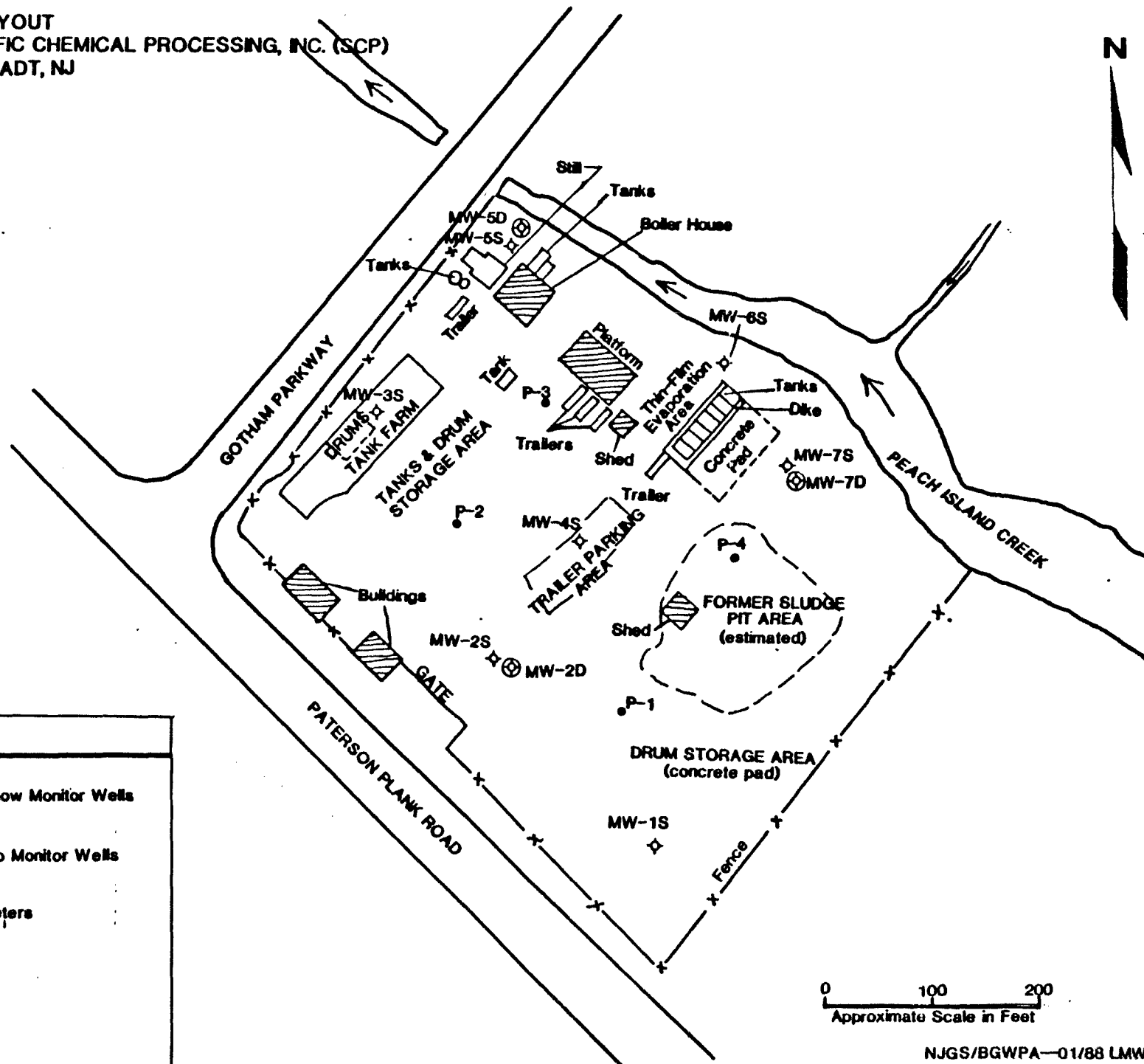


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Kevin Schick, NJDEP-BEERA
Linda Welkom, NJDEP-BGWPA

FIGURE 2:-- SITE LAYOUT
SCIENTIFIC CHEMICAL PROCESSING, INC. (SCP)
CARLSTADT, NJ



KEY

- ◇ MW-1S Existing Shallow Monitor Wells
- ⊕ MW-2D Existing Deep Monitor Wells
- P-1 Existing Piezometers

0 100 200
 Approximate Scale in Feet